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CLERK U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES

BY:

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2014 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEREK WAI HUNG TAM SING,  
aka "ceven1073,"  
aka "chuckeven8,"

Defendant.

CR 14-0212

CR No.

I N D I C T M E N T

[18 U.S.C. §§ 1832(a)(2),  
(a)(4): Unauthorized  
Transmission and Attempted  
Transmission of Trade Secrets;  
18 U.S.C. §§ 1832(a)(3), (a)(4):  
Unauthorized Possession and  
Attempted Possession of Trade  
Secrets]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

1. From on or about April 30, 2012, until his termination  
on or about November 28, 2012, in Los Angeles County, within the  
Central District of California, defendant DEREK WAI HUNG TAM  
SING, also known as ("aka") "ceven1073," aka "chuckeven8"  
("defendant" or "SING"), worked for Rogerson Kratos as a power  
supply engineer, specializing in analog work. In order to  
perform his required duties at Rogerson Kratos, defendant SING  
had access to Rogerson Kratos proprietary information, including  
trade secrets.

1       2. At all times relevant to this Indictment, defendant  
2 SING was the user of the email account "ceven1073@gmail.com."

3       3. At all times relevant to this Indictment, Rogerson  
4 Kratos designed, manufactured, and supplied aerospace products,  
5 including display units for various aircraft, and maintained its  
6 headquarters in Los Angeles County, within the Central District  
7 of California.

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1 COUNTS ONE THROUGH THIRTY-SIX

2 [18 U.S.C. §§ 1832(a)(2), (a)(4)]

3 4. The Grand Jury repeats and re-alleges paragraphs 1  
4 through 3 of this Indictment as if fully set forth herein.

5 5. On or about the dates set forth below, in Los Angeles  
6 County, within the Central District of California, and  
7 elsewhere, defendant DEREK WAI HUNG TAM SING, also known as  
8 ("aka") "ceven1073," aka "chuckeven8" ("defendant" or "SING"),  
9 with intent to convert a trade secret that was related to a  
10 product used in or intended for use in interstate and foreign  
11 commerce, to the economic benefit of someone other than Rogerson  
12 Kratos, and knowing and intending that the offense would injure  
13 Rogerson Kratos, knowingly and without authorization  
14 transmitted, sent; mailed, communicated, and conveyed, and  
15 attempted to send, mail, communicate, and convey, the following  
16 Rogerson Kratos trade secrets:

COUNT	DATE	TRANSMISSION METHOD	TRADE SECRET
ONE	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com	A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A."
TWO	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics.com	A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E"

1	THREE	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics .com	A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F"
2	FOUR	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics .com	A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B"
3	FIVE	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics .com	A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635- 0160-1, Rev. C"
4	SIX	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics .com	A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635- 0152, Rev. J"
5	SEVEN	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:44 pm, to [m.s.]@aspenavionics .com	A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)"
6	EIGHT	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:44 pm, to [m.s.]@aspenavionics .com	A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924"

1	NINE	Jan. 9, 2013	Email from ceven1073@gmail.com, sent at approximately 6:40 pm, to [m.s.]@aspenavionics .com	A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635- 0389, Rev. C"
5	TEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A."
9	ELEVEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635- 0343-2, Rev. E"
13	TWELVE	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F"
18	THIRTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B"
22	FOURTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635- 0160-1, Rev. C"
25	FIFTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635- 0152, Rev. J"

1	SIXTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)"
7	SEVENTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924"
11	EIGHTEEN	Jan. 14, 2013	Email from ceven1073@gmail.com, sent at approximately 11:31 am, to [r.j.]@meggitt.com	A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635- 0389, Rev. C"
15	NINETEEN	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A."
19	TWENTY	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635- 0343-2, Rev. E"
23	TWENTY- ONE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F"

1	TWENTY-TWO	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B"
2	TWENTY-THREE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C"
3	TWENTY-FOUR	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J"
4	TWENTY-FIVE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)"
5	TWENTY-SIX	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924"
6	TWENTY-SEVEN	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Aspen Avionics in Albuquerque, New Mexico	A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635-0389, Rev. C"

1	TWENTY-EIGHT	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A."
2	TWENTYNINE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E"
3	THIRTY	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A four-page schematic drawing titled "SCHEMATIC POWER SUPPLY/LED BACKLIGHT DRV., 430 IIDS" and further identified as "Drawing No. 0635-0376, Rev. F"
4	THIRTY-ONE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B"
5	THIRTY-TWO	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A four-page schematic drawing titled "SCHEMATIC, REAR PANEL" and further identified as Drawing No. "0635-0160-1, Rev. C"
6	THIRTY-THREE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J"

1	THIRTY-FOUR	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)"
7	THIRTY-FIVE	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924"
11	THIRTY-SIX	Jan. 2013	EMTEC brand USB drive mailed from defendant SING in California, to Barco, Inc. in Xenia, Ohio	A four-page schematic drawing titled "SCHEMATIC OPTREX LCDI/LED DRIVER & CTRL" and further identified as "Drawing No. 0635-0389, Rev. C"

1 COUNTS THIRTY-SEVEN THROUGH FORTY-TWO

2 [18 U.S.C. §§ 1832(a)(3), (a)(4)]

3 6. The Grand Jury repeats and re-alleges paragraphs 1  
4 through 3 of this Indictment as if fully set forth herein.

5 7. Beginning on or about November 29, 2012, and  
6 continuing to on or about February 14, 2013, in Los Angeles  
7 County, within the Central District of California, and  
8 elsewhere, defendant DEREK WAI HUNG TAM SING, also known as  
9 ("aka") "ceven1073," aka "chuckeven8" ("defendant" or "SING"),  
10 with intent to convert a trade secret that was related to a  
11 product used in or intended for use in interstate and foreign  
12 commerce, to the economic benefit of someone other than Rogerson  
13 Kratos, and knowing and intending that the offense would injure  
14 Rogerson Kratos, knowingly possessed, and attempted to possess,  
15 the following Rogerson Kratos trade secrets knowing them to have  
16 been stolen, and appropriated, obtained, and converted without  
17 authorization:

COUNT	TRADE SECRET
THIRTY- SEVEN	A nine-page schematic drawing titled "SCHEMATIC IO_A, EHPD, CEBI, KAI" and further identified as "Drawing No. 0635-0367-1, Rev. A."
THIRTY- EIGHT	A thirteen-page schematic drawing titled "SCHEMATIC, PCB CPU MODULE WITH FPGA" and further identified as "Drawing No. 0635-0343-2, Rev. E"
THIRTY- NINE	A four-page schematic drawing titled "SCHEMATIC DIAGRAM, DISPLAY GENERATOR" and further identified as Drawing No. "0635-0070, Rev. B"
FORTY	A ten-page schematic drawing titled "SCHEMATIC, HYBRID I/O" and further identified as "Drawing No. 0635-0152, Rev. J"

1	FORTY- ONE	A thirty-six page document titled "REVISION B 9902-0390 ACCEPTANCE TEST PROCEDURE FOR CONTROLLER/SEQUENCER PNEUMATIC BOOT DE-ICER FOR CASA P/N 3690AC-1 MOD-2A AND 3690AC-2A (REPLACES DOC. NO. ATP 3690AC)"
4	FORTY- TWO	A four-page schematic drawing titled "SCHEMATIC-DE ICE CONTROLLER" and further identified by the following letters and numbers "C 04192 36924"

6  
7 A TRUE BILL  
8  
9  
10   
Foreperson

11 ANDRÉ BIROTTÉ JR.  
United States Attorney

12 

13 ROBERT E. DUGDALE  
Assistant United States Attorney  
14 Chief, Criminal Division

15 WESLEY L. HSU  
Assistant United States Attorney  
16 Chief, Cyber and Intellectual Property  
Crimes Section

17 TRACY L. WILKISON  
Assistant United States Attorney  
18 Deputy Chief, Cyber and Intellectual  
Property Crimes Section

19 STEPHANIE S. CHRISTENSEN  
Assistant United States Attorney  
20 Cyber and Intellectual Property Crimes  
Section